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- 1 A. I don't remember.
- 2 Q. So there is the gesture that the deputy made,
- 3 problems concentrating in school, anger management. Were
- 4 there other factors or circumstances that played a role in
- 5 your deciding for him to see a psychologist?
- 6 A. Not that I recall.
- 7 Q. Ms. Harris, is there any familial -- that is, in
- 8 your family. Is there any familial history of any form of
- 9 mental illness in your natural family?
- 10 A. No.
- 11 Q. Okay. Is there any familial history of any form
- 12 of mental illness in your husband's natural family?
- 13 A. I believe his mother.
- 14 Q. Okay. Can you tell me what you understand his
- 15 mother's mental illness to have been?
- 16 A. I don't know.
- 17 Q. Okay. What caused you to answer -- to say his
- 18 mother when I asked you about familial history?
- 19 A. Because I was aware, at one point in time, she
- 20 had a mental -- was treated for mental illness.
- 21 Q. Okay. That was during the time that you and
- 22 your husband were married?
- 23 A. No, this was -- I believe Wayne was a child.
- 24 Q. Okay. Do you know anything about the nature of
- 25 her mental illness at all?

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- 1 A. I don't. You'll have to ask Wayne.
- 2 Q. Okay. Do you know whether Wayne's mother's
- 3 treatment involved an in-hospital treatment?
- 4 A. I don't know.
- 5 Q. Okay. Ms. Harris, did you meet Dr. Albert at or
- 6 about the time that Eric began seeing him?
- 7 A. Yes.
- 8 Q. Okay. Did you meet Dr. Albert in his office?
- 9 A. Yes.
- 10 Q. Can you tell me about how long your first
- 11 meeting with Dr. Albert lasted?
- 12 A. 45 minutes approximately.
- 13 Q. Had he seen Eric alone for some longer period of
- 14 time that day?
- 15 A. For a longer period of time than 45 minutes?
- 16 Q. Oh, I'm sorry. I misunderstood your answer. It
- 17 was 45 minutes?
- 18 A. The three of us were together.
- 19 Q. Okay. I thought you said four to five minutes.
- 20 A. Oh, I'm sorry. No.
- 21 Q. So the first visit with Dr. Albert, all three of
- 22 you met for about 45 minutes?
- 23 A. Yes.
- 24 Q. Okay. And can you remember what you talked
- 25 about during that first visit with Dr. Albert?

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- 1 A. It was regarding the van incident. And as I
- 2 stated to you, the other reasons, concentration. That's
- 3 all I can recall right now.
- 4 Q. Can you recall whether Dr. Albert gave Eric a
- 5 written questionnaire for him to fill out?
- 6 A. He did.
- 7 Q. He did?
- 8 (Deposition Exhibit 4 was marked.)
- 9 Q. Ms. Harris, I'm going to hand you what has been
- 10 marked as Exhibit KH-4. And it is Bates range MK 0000323
- 11 consecutively through 338. Ms. Harris, I'm not going to
- 12 ask you to verify this. I'm just going to represent to you
- 13 that your lawyer is familiar with it already. This is a
- 14 copy of Dr. Cram's -- some records that you all produced in
- 15 the case. And I want to ask you about the page that is
- 16 marked as MK 0000336. Let me ask to you, please, to take a
- 17 look at that and tell me whether you can recognize that as
- 18 the questionnaire that Eric filled out in Dr. Albert's
- 19 office.
- 20 A. I have never seen this before.
- 21 Q. Okay. Ms. Harris, before you visited with
- 22 Dr. Albert for the first time on February 16, had you ever
- 23 observed anything about Eric that caused you to believe
- 24 that he was feeling downhearted, blue, or sad?
- 25 A. Well, sure, at times.

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- 1 Q. Can you recall some of the things that made him
- 2 feel blue or sad?
- 3 A. Having to work late on school nights. No
- 4 girlfriend. I'd wake him up at 11 or 12 on a Saturday
- 5 morning, and he wouldn't know why I wanted him to get up at
- 6 12:00 on a Saturday. He had tests to study for. Just
- 7 teenage stuff.
- 8 Q. Okay. Ms. Harris, before your first visit with
- 9 Dr. Albert on February 16, had you ever seen Eric cry?
- 10 A. Before Albert --
- 11 Q. Let me limit this question to his high school
- 12 years. I'm not asking you to remember back to, you know,
- 13 when he was six years old; but let's just talk about when
- 14 Eric was a teenager in high school. And let me ask it
- 15 again with that privy. Before you visited with Dr. Albert
- 16 the first time, can you recall Eric crying?
- 17 A. I can't, right off, give you a specific. No, I
- 18 can't.
- 19 Q. Ms. Harris, before you visited Dr. Albert for
- 20 the first time, can you recall Eric ever having any
- 21 sleeping problems?
- 22 A. No.
- 23 Q. Ms. Harris, before you visited Dr. Albert for
- 24 the first time on February 16, 1998, can you recall Eric
- 25 ever acting restless or being unable to remain still?